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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
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Case No.: 5:20-cv-03664-LHK-SVK

**PLAINTIFFS' ADMINISTRATIVE  
 MOTION TO SEAL PORTIONS OF  
 PLAINTIFFS' OBJECTIONS TO  
 SPECIAL MASTER'S REPORT (DKT.  
 299)**

The Honorable Susan van Keulen  
 Date: November 4, 2021  
 Time: 10:00 a.m.  
 Courtroom 6 - 4th Floor

Pursuant to Civil Local Rules 7-11 and 79-5, Plaintiffs respectfully seek to seal portions of Plaintiffs' Objections to the Special Master's Report and Orders on Referred Discovery Disputes (Dkt. 299) that refer to material designated by Google as "Confidential" or "Highly Confidential – Attorneys' Eyes Only." This motion to seal pertains to the following documents and information.

Document Sought to be Sealed	Party Claiming Confidentiality	Portions to be filed under seal	Basis for Sealing Portion of Document
Plaintiffs' Objections to the Special Master's Report and Orders on Referred Discovery Disputes ("Plaintiffs' Objections")	Google	Portions highlighted in <b>Blue</b> on Pages 1-5.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Plaintiffs' [Proposed] Order Regarding Plaintiffs' Objections to the Special Master's Report and Orders on Referred Discovery Disputes	Google	Portions highlighted in <b>Blue</b> on Pages 2-3.	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit A to Plaintiffs' Objections, GOOG-CABR-03662096	Google	The entire document.	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit B to Plaintiffs' Objections, GOOG-BRWN-00184875	Google	The entire document.	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit C to Plaintiffs' Objections, GOOG-BRWN-00433503	Google	The entire document.	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order
Exhibit D to Plaintiffs' Objections, GOOG-BRWN-00204684	Google	The entire document.	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only"

			pursuant to the Protective Order
Exhibit E to Plaintiffs' Objections, GOOG-BRWN-00168623.C	Google	The entire document.	Material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Protective Order

Pursuant to Civil Local Rule 79-5(e), Google, as the Designating Party, bears the responsibility to establish that its designated material is sealable.

Respectfully submitted,

Dated: October 27, 2021

By: /s/ William Christopher Carmody

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